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APPLICATION OF SOUTHWESTERN

§ BEFORE THE STATE OFFICE

ELECTRIC POWER COMPANY FOR AUTHORITY TO CHANGE RATES

§ OF § ADMINISTRATIVE HEARINGS

SOUTHWESTERN ELECTRIC POWER COMPANY'S STATEMENT UNDER SECTION 4 OF PROTECTIVE ORDER

Certain documents provided in response to Sierra Club's First Request for Information to Southwestern Electric Power Company (SWEPCO), Question Nos. 1-5, 1-7, 1-8, 1-11, and 1-16 are exempt from public disclosure pursuant to Section 552.110 of the Public Information Act<sup>1</sup> and are subject to treatment as Confidential and/or Highly Sensitive materials.

The Confidential materials provided in response to Sierra Club's Question No. 1-11 contain non-public, commercially-sensitive, internal financial data compilations including energy storage data, solar installation historical and forecast information, wind cost analyses and price modeling under various assumptions, or other cost and annual growth data that if released, would provide an advantage to a competitor or bidder and could cause substantial competitive harm to SWEPCO.

The Highly Sensitive materials provided in response to Sierra Club's Question Nos. 1-5, 1-7, 1-8, and 1-16 contain non-public, commercially-sensitive, unit disposition analyses, including detailed economic analyses concerning particular generating units under various assumptions and containing forecasts and projections, along with other detailed data compilations, and plant-specific operational metrics that if released, would provide an advantage to a competitor or bidder and could cause substantial competitive harm to SWEPCO.

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<sup>&</sup>lt;sup>1</sup> Tex. Gov. Code Ann. § 552.001-.353.

Counsel for SWEPCO has reviewed the documents sufficiently to state in good faith that the documents are exempt from disclosure under the Public Information Act and merit the Confidential and Highly Sensitive designation given to them.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on March 9, 2021, in accordance with the Second Order Suspending Rules issued in Project No. 50664 and Order No. 1 in this matter.

Hayhanie Green